

# EXHIBIT A

Jenifer L. Tomchak (10127) ([jen.tomchak@tomchaklaw.com](mailto:jen.tomchak@tomchaklaw.com))  
Nicole A. Skolout (10223) ([nicole.skolout@tomchaklaw.com](mailto:nicole.skolout@tomchaklaw.com))  
TOMCHAK SKOLOUT  
10 West 100 South, Suite 700  
Salt Lake City, Utah 84101  
Telephone: (801) 831-4820

*Attorneys for Defendants Julius Mwale and Kaila Mwale*

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, NORTHERN DIVISION**

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MATHEW SHAW and BROOKE SHAW,  
Plaintiffs,

vs.

JULIUS MWALE and KAILA MWALE,  
Defendants.

**SUPPLEMENTAL DECLARATION OF  
JULIUS MWALE**

Case No. 1:24-cv-00122-AMA-DBP

Judge Ann Marie McIff Allen

Magistrate Judge Dustin B. Pead

I, Julius Mwale, state and declare as follows:

1. I am married to Kaila Mwale (“Kaila”).
2. Kaila and I did not invite Mathew Shaw or Brooke Shaw (the “Shaws”) to visit us in Kenya when we first met the Shaws during our lone trip to Utah from February 17–24, 2022. However, we did invite the Shaws to visit us in Kenya during one of the times they visited us at our home in Alamo, California.

3. When discussing the Africa projects with the Shaws, I mentioned that I was investing in Akon's smart city project in Senegal. However, I did not offer to introduce the Shaws to Akon.

4. Kaila and I did not discuss electric scooters with the Shaws or their son at any time while we were in Utah, and I did not suggest that I could help the Shaws' son start an electric scooter company in Kenya, offer to purchase any electric scooters from him, or suggest that I would introduce him to Elon Musk.

5. The only time that I talked about Elon Musk with the Shaws is when the Shaws visited in Kenya. I mentioned that his company, Tesla, provided the batteries to power our smart city in Kenya. This information is also publicly available.

6. I sent Mathew Shaw videos pertaining to our smart city projects when Kaila and I were in Utah because we were talking with the Shaws about our work and some of our projects since we had just met and were getting to know them, and the Shaws had expressed interest in those projects and requested to know where they could learn more about them. The videos that I sent to him are all publicly available.

7. I have never shown a balance sheet for any of my companies to the Shaws.

8. Kaila and I have never asked our friend, Gordon Bowen ("Gordon"), to introduce us to anyone to help grow our business or establish business relationships. However, because we are friends, Gordon has introduced us to certain people he knows and we have likewise introduced him to people we know.

9. Gordon invited us to dinner at his home in Utah on February 18, 2022. We did not know in advance that anyone else would be at Gordon's home when he invited us.

10. Senator Romney passed by Gordon's home after the dinner to say hello to Gordon, and Gordon introduced him to Kaila and me briefly. I did not offer to make any contributions to Senator Romney's campaign on February 18, 2022 or at any other time, and I did not offer to give Senator Romney's son space at our hospital in Kenya either.

11. I believe I showed the Shaws a recorded non-confidential video call that I had with Senator Romney when they visited Kaila and me at our home in Alamo, California after they did not speak well of him and I shared how he has good intentions to help Americans and Kenyans.

12. Gordon introduced me to Meg Whitman well before the visit to Utah in February 2022. She was not the ambassador to Kenya at the time I met her.

13. I do not recall ever meeting or being introduced to Ashley Rees or Ned Chini.

14. Gordon introduced Kaila and me to Stacey Shulman in California.

15. Gordon did not introduce us to Shelley Zallis. Shelley Zallis introduced Kaila and me to Gordon in New York.

16. Meg Whitman, Ashley Reese, Ned Chini, Stacey Shulman, and Shelley Zallis did not attend the dinner that Gordon had at his home in Utah on February 18, 2022.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 3rd day of December, 2024.



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Julius Mwale